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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Administration of the
North American Numbering Plan

Notice of Proposed Rulemaking

CC Docket 92-237

REPLY COMMENTS OF BELL ATLANTIC

In these Reply Comments, Bell Atlantic¹ addresses four issues: (1) funding of the new NANP administrator should be forward looking; (2) the states, who are closest to customers preferences, should decide dialing plans; (3) a two-year transition period to four-digit Feature Group D carrier identification codes is reasonable; and (4) the Commission should consider presubscription for interstate intraLATA calls in the broader context of establishing rules to permit the Bell companies to enter the long distance market.

Funding. A number of parties contend that the costs to fund the new NANPA should be paid by those seeking assignment of new numbers and those who already have existing numbers.² However,

¹ The Bell Atlantic telephone companies serving New Jersey, Pennsylvania, Delaware, Maryland, Virginia, West Virginia and the District of Columbia, Bell Atlantic Mobile and Bell Atlantic Personal Communications.

² E.g., Nextel Comments, p. 11 (funding "must be borne proportionally by those parties currently using numbers that were previously assigned, as well as by those requesting assignment of

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Bell Atlantic and the other Bell companies, as the owners of Bellcore, have funded the NANPA for the last ten years -- while the entire telecommunications industry benefitted from the work provided by the NANPA. Bell Atlantic should not be required to pay again for the same numbers.

Dialing plans. The Commission should not preempt well established local authority over dialing plans. Local regulators have established dialing plans based on customer needs and preferences in each jurisdiction. Permissive 1+ ten-digit dialing is available throughout the Bell Atlantic region. Thus anyone can make a toll call by dialing 1+ ten digits. Requiring 1+ dialing for toll calls, however, ignores the unique and diverse circumstances of customers in varied jurisdictions in order to achieve the debatable goal of uniformity.

Transition for Feature Group D CIC expansion. The transition period for permissive dialing should be two years or less rather than six, especially since the plan to change to four-digit Feature Group D CICs is already six years old. All members of the industry have had more than enough time to plan for this transition and there is no reason for additional delay.

Furthermore, an additional six-year delay now might result in the exhaust of available codes before the end of the transition period. Under the plan agreed upon by the industry, a total of 2,000 four-digit codes will be available during the

new numbering resources."); Teleport Comments, p. 6 ("fee must not only be assessed prospectively, but retroactively as well").

transition period.³ Because of the shortage of three-digit CICs during the past five years, code conservation rules have limited the NANPA to assigning only one CIC per entity. When the new four-digit CICs become available, this limit will be increased to six. Although Bell Atlantic cannot say with certainty the amount of demand there will be for CICs in the future, it is quite likely that the demand will exceed the supply before the six-year transition period is over.

A number of factors are likely to increase the rate at which entities request new CICs. First, for the last four years, entities have been limited to one CIC and, therefore, there is pent up demand for FGD CICs. Currently more than 700 entities hold at least one three-digit CIC,⁴ and many will surely seek additional codes. Second, personal communications service companies, competitive access providers and providers of other new services will seek CICs. Third, there will be additional demand from Canadian carriers for CICs with the introduction of equal access there. Fourth, as competition increases, existing providers including the Bell companies and cable companies will enter new fields and request additional codes. Thus, if the Commission adds

³ During the transition, four-digit CICs in the "5XXX" and "6XXX" series will be assigned. Switching systems will be able to perform translations and routing without invoking timing because there are no three-digit CICs in the 10X, 15X or 16X series of codes. After all the 5XXX and 6XXX series are assigned, the transition period must end, and switching systems will not be able to convert to four-digit CICs. The number of available CICs will be increased to 10,000

⁴ Bellcore Comments, pp. 8-9.

an additional six years to the transition period, the industry faces the very real possibility that it will be forced to adopt additional conservation measures for CICs -- exactly the situation that the switch to four-digit codes was intended to avoid.

Presubscription. The Commission should consider issues relating to interstate intraLATA presubscription when it considers rules to allow the Bell companies to enter the interLATA market. If this is done, the Commission will be able to ensure that all competitors can compete fairly for the intraLATA toll market.

Some parties contend that the local exchange carriers have a lock on the interstate intraLATA business because they have a dialing advantage -- that the only way for a customer to use an interexchange carrier's service is to dial extra digits.⁵ This is not the case. For example, much of the intraLATA toll calling is by business customers. It is a simple matter to have a PBX or other CPE automatically send all intraLATA calls to the customer's chosen interexchange carrier, without the caller's having to dial any extra digits.

Finally, the fact that customers must dial extra digits does not seem to be slowing the interexchange carriers' marketing efforts. For example, AT&T is specifically urging customers in its advertising to use "10ATT" to place intraLATA calls.⁶ Other dialing patterns that have been highly promoted by the interexchange carriers, such as 1-800-OPERATOR, 1-800-CALL ATT and

⁵ E.g., Allnet Comments, p. 4.

⁶ A copy of an AT&T advertisement is attached as Exhibit 1.

1-800-COLLECT, will automatically send intraLATA as well as interLATA calls to the interexchange carrier.

The interexchange carriers would have the Commission believe that the intraLATA marketplace needs them to make it more competitive and to lower prices to consumers.⁷ The factual record demonstrates that these prices charged by these carriers in the interLATA marketplace have actually been going up at more than three times the rate of inflation, according to a Commission study, nearly ten percent in the preceding twelve months. By contrast, the latest interstate rates filed by Bell Atlantic (to go into effect July 1, 1994) are at or below AT&T's tariffed rates for all time periods and all mileage bands. Finally, consumers will ultimately be required to pay the costs of implementing presubscription -- even though it does not provide them any additional choices.⁸

Conclusion

The Commission should quickly establish procedures to select a new NANP administrator which will be funded by all who


⁷ E.g., AT&T Comments, pp. 4-5.

⁸ Allnet states that modified Two-PIC has been the choice of "leading local exchange carriers." Allnet Comments, p. 6. However, full Two-PIC has been the presubscription option of those task forces that have examined presubscription. Supplement to SNET's Proposed Intrastate Interexchange Equal Access Implementation Plan, Oct. 8, 1993, p. 5; Report of the Kentucky IntraLATA Equal Access Task Force to the Public Service Commission of Kentucky, Nov. 6, 1992, pp. 16-17; North Dakota Public Service Commission Order, April 7, 1992, p. 24; Final Report of the Task Force on IntraLATA Presubscription (New York), Sept. 6, 1991, Vol. I, pp. 6-8; Report of the Equal Access and Presubscription Implementation Study Committee to the Minnesota Public Utilities Commission, June 30, 1989, p. 21.

benefit from numbering resources, should not impose uniform dialing plan on the States, should institute a two-year transition period to four-digit Feature Group D CICs and should consider presubscription for interstate intraLATA calls in the broader context of permitting the Bell companies to enter the long distance market.

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EXHIBIT 1

Introducing the smart way to call
from Delaware to Philadelphia.

10-ATT

Dial it and save.



Now when calling from home, you can save 10% on toll calls from Delaware to anywhere within the map.*

Check your phone bill. You'll probably be surprised at how much your local phone company is charging for toll calls

to the 215 and 610 area codes in the Philadelphia area.

Fortunately you have another choice that can save you 10%. Just dial 10-ATT

first before you make a toll call from home to the 215 and 610 area codes.

Dial 10-ATT + 1 + the area code and the number you're calling. Dial it now and start saving. There's no need to sign up, and no monthly fee.

If you have any questions about when to use 10-ATT give us a call at 1-800-282-4212 ext. 66100.

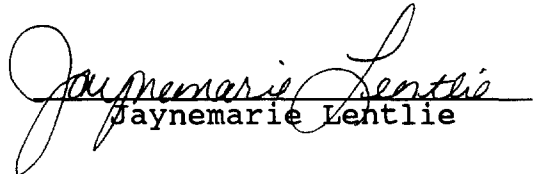
AT&T is bringing quality and savings even closer to home.

AT&T. Your True Voice.™



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Reply Comments of Bell Atlantic" was served this 30th day of June, 1994, by first class mail, postage prepaid, on the parties on the attached list.


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